

EXHIBIT J-02

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Privacy Policy

GENERAL .1

At Duolingo, we care about your personal data, so we have prepared this Privacy Policy to explain how we collect, use and share it

This Privacy Policy ("**Privacy Policy**") details the personal data Duolingo, Inc. ("**Duolingo**", "**we**", "**us**" or "**our**") receives about you, how we process it and your rights and obligations in relation to your personal data. Duolingo, Inc., a company registered at 5900 Penn Ave, Second Floor, Pittsburgh, PA 15206, United States of America is the data controller for the purposes of the General Data Protection Regulation ("**GDPR**") and any relevant local legislation ("**Data Protection Laws**")

By using or accessing the Service, you agree to the terms of this Privacy Policy. Capitalized terms not defined here have the meanings set forth in the terms and conditions (the "**Terms and Conditions**"), located at www.duolingo.com/terms. We may update our Privacy Policy to reflect changes to our information practices. If we do this and the changes are material, we will post a notice that we have made changes to this Privacy Policy on the Website for at least 7 days before the changes are made, and we will indicate the date these terms were last revised at the bottom of the Privacy Policy. Any revisions to this Privacy Policy will become effective at the end of that 7 day period

INFORMATION WE COLLECT .2

When you use Duolingo you provide us with information you submit via the Service, and we collect information regarding your use of the Service as you interact with the Service

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Information you provide

Through the registration process, you will provide us with your name, e-mail address (or parent's e-mail address), and age or date of birth. You will also provide us with your payment transaction information if you .choose to pay for Duolingo services

Activity Data

When you use the Service, you will submit information and content to your profile. We will also generate data about your use of our Services including your engagement in educational activities on the Service, or your sending of messages and otherwise transmitting information to other users ("Activity Data"). We also collect technical data about how you interact .with our Services; for more information, see Cookies

Test Data

If you register for the Duolingo English Test, you will also provide us with your gender, native language, secondary school, and self-reported test scores for other exams. Each time you take a test you must also provide a photo of a current, valid driver's license, passport, or other government issued ID and a take a photo of your face to verify your identity ("Testing .ID")

When you use the Service to take an examination in the Duolingo English Test you must provide access to your computer's webcam and microphone. We will use them to record you and your screen during the entire examination period ("Testing Video"). While using the Duolingo English Test, you will submit answers to questions and other information .as part of the testing and evaluation process

Third Party Data

We also collect information about you from third parties. For more .information, see Information obtained by Third Parties

COOKIES .3

When you enter the Website, we collect your browser type and your IP address (a unique address that identifies your computer on the Internet).

When you use our mobile Application, we collect your device type, your ^{الخصوصية} device ID, and your IP address

In addition, we store certain information from your browser using "cookies." A cookie is a piece of data stored on the user's computer tied to information about the user. We use session ID cookies to confirm that users are logged in. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you certain features available on the Website (e.g., customized delivery of information)

You can find more information about cookies and how to manage them at <https://web.archive.org/web/20180705115213/http://www.allaboutcookies.org>

INFORMATION OBTAINED BY THIRD PARTIES .4

To support and enhance the Service, we work with a variety of third party advertising networks, marketing analytics service providers and website analysis firms, such as Google, Facebook, Oath, Unity, and Quantcast (collectively, "**Third Party Advertising Service Providers**"). These Third Party Advertising Service Providers collect and use non-personally identifiable information, such as your mobile device ID, about your visits to and use of the Website and mobile Application, as well as other websites in order to serve you with advertisements and content tailored to meet your preferences and likely interests or better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes

We use Google Analytics which is a web analytics tool that helps us understand how users engage with the Website. Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by

Google Analytics across all websites you use, visit this Google page:
[archive.org/web/20180705115213/https://tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout)

You can opt-out of receiving personalized ads from main advertisers and ad networks that are members of the Network Advertising Initiative ("NAI") or who follow the DAA Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools. The NAI's opt-out tool can be found here [archive.org/web/20180705115213/http://www.networkadvertising.org/choices/](https://www.networkadvertising.org/choices/) and the DAA's opt out tool can be found here [s://web.archive.org/web/20180705115213/http://www.aboutads.info/choices](https://www.aboutads.info/choices) ./

In addition, your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for online behavioral advertising (for example, Apple iOS' Advertising ID and Google Android's Advertising ID). Please note that .opting out does not prevent the display of all advertisements to you

USE OF INFORMATION OBTAINED BY DUOLINGO .5

Duolingo may occasionally send you service related and product change announcements through the general operation of the Service. We will send you reminder notifications to support the Duolingo teaching methodology by reinforcing the learning cadence and help maintain your learning streak.

We process your data to help provide you with the Service and offer personalized features, to understand and improve our Service and to keep .our Service safe and secure

Duolingo may use or share anonymous data collected through the Service, including Activity Data. As a business, it is critical that we perform our contract with you with the best service possible, and it is in our legitimate interests to perform these processing functions and to enable service e-mails by default to keep your data secure and provide our Service. You .may opt out of any non-essential service e-mails at any time

We may also use your contact information to send you notifications regarding new services, offers and promotions offered by Duolingo if you .affirmatively consent to receive such communications

Profile information is used by Duolingo to be presented back to and edited by you when you access the Service and to be presented to other users. In some cases, other users may be able to supplement your profile, including by submitting comments (which can be deleted by you). Duolingo uses this information to provide you with support, to send you essential notifications, to enforce our terms, conditions and policies, to communicate with you, to administer the Services, and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes. Duolingo's Terms and Conditions provide the contractual lawful basis for these processing activities

Duolingo English Test

When you take a test in the Duolingo English Test, we will use your computer's camera and microphone throughout the test to collect a .Testing Video

We will process information in connection with the Duolingo English Test comprising given name(s), surname(s), date of birth, gender, native language, country, secondary school, self-reported test scores for other exams, application IDs, a picture or scan of a current, valid driver's license, passport or other government issued ID, your Testing ID, Testing Video, and answers to questions as part of the testing and evaluation process in :order

- To provide accurate testing results to Score Recipient(s) (as defined below) ◦
- To compare your Testing ID to your Testing Video to ensure that the person who registered for the examination (and whose identity Duolingo has validated) is the same person who took the examination ◦
- To store and review the Testing Video recording to validate that you took the examination without improper assistance ◦
- To evaluate your performance on the Duolingo English Test, to report results and to evaluate the usefulness, accuracy and other aspects of the Duolingo English Test ◦
- For our research team to validate and improve the examination, in an anonymized format ◦
- To analyze audio recordings of verbal responses to improve our ability to understand the spoken language ◦
- To share your Testing ID with your consent upon initiation of a dispute by a Score Recipient ◦

Duolingo's Terms and Conditions provide the contractual lawful basis for these English Test processing activities

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES .6

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Duolingo shares your personal data only when it is necessary to offer the .Service, legally required, or permitted by you

We will provide personal data to hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such .as Mixpanel and Crashlytics, and support providers such as ZenDesk

These data processors help us bring you the Service. For example, we may share your information in order to detect where or how you encountered a bug when using our mobile application. In connection with these operations, our service providers will have access to personal data for a limited time. When we utilize service providers for processing any personal data, we implement contractual protections limiting the use of that .personal data to the provision of services to Duolingo

We will be required to access and disclose personal data in response to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. Additionally, we will access and share account or other personal data when we believe it is necessary to comply with law, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Service or using the Duolingo name, or to prevent imminent harm. This will include accessing and sharing personal data with .other companies, lawyers, agents or government agencies

Duolingo will share the complete and accurate results of Duolingo English Tests with such institutions, including universities, potential employers, or other third parties, (collectively, "**Score Recipients**") as specified when you send your results after finishing a test or when you apply a coupon sponsored by the Score Recipient before starting a test. These results will include your test score, a video of the interview section of your test, and your written responses to certain parts of the test. We will also share your full name, date of birth, e-mail address, and the photo you take of yourself.

We will never share examination results with any party without your approval, except that anonymized examination results will be used by Duolingo and its partners to improve the examination and for research and analysis. We will not share your Testing ID with any Score Recipients, .except with your consent upon initiation of a dispute by a Score Recipient

If the ownership of all or substantially all of the Duolingo business, or individual business units or assets owned by Duolingo that are related to the Service, were to change, your personal data will be transferred to the new owner. In any such transfer of information, your personal data would remain subject to this section.

Duolingo will share aggregate or anonymous data collected through the Service, including Activity Data, for purposes such as understanding or improving the service.

DATA SUBJECT RIGHTS AND DATA RETENTION .7

You can manage your account settings at <https://www.duolingo.com/settings/account> to update, amend, and correct your information.

You also have the following rights in relation to the personal data we hold about you, unless provided otherwise by local law:

- To request access to, or erasure of, the personal data we hold about you
- To request us to restrict the processing of the personal data we hold about you
- To object to us processing personal data relating to you
- Where you have given us consent to process your personal data, you have the right to withdraw that consent at any time
- To export the personal data you have provided to Duolingo in a format that can be transferred electronically to a third party
- To delete your account with Duolingo by following the instructions available through the Service

Duolingo will retain your data until your account is deleted, after which point we will retain anonymous data collected through the Service, including Activity Data, which may be used by Duolingo and shared with third parties in any manner. Information associated with the Duolingo English Test, including examination results and your Testing Video, will be collectively deleted from your Duolingo account after five years have passed from the date you upload your test, but anonymized examination data, including your examination results and Testing Video, will be kept indefinitely by Duolingo to improve the examination and for research and analysis.

Please note that some of these rights are not absolute. In some cases, we may refuse a request to exercise particular rights if complying with it meant that we are no longer able to meet our contractual obligation to provide you with particular products and services. We will keep you informed as to the actions that we can take when you make your request.

THIRD PARTY WEBSITES AND LINKS .8

Please note that you may have cookies placed on your computer by third party websites that refer you to our Service. Although we do not share your personal data with these third party websites unless it is reasonably necessary to offer the Service, they may be able to link certain non-personally identifiable information we transfer to them with personal data they previously collected from you. Please review the privacy policies of each website you visit to better understand their privacy practices. In addition, Duolingo would like to inform you that anytime you click on links (including advertising banners), which take you to third party websites, you will be subject to the third parties' privacy policies.

Our Services contain links to other sites operated by third parties. Duolingo does not control such other sites and is not responsible for their content, their privacy policies, or their use of personal data, including any personal or financial information collected by our third party payment processor to process payments for in-app purchases. Duolingo's inclusion of such links does not imply any endorsement of the content on such sites or of their owners or operators except as disclosed on the Services. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

PRIVACY SHIELD COMPLIANCE .9

Duolingo complies with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data transferred from the European Union and Switzerland to the United States, respectively.

Duolingo is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If

there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, please visit U.S. Department of Commerce's Privacy Shield List

Duolingo acknowledges the right of EU and Swiss individuals to access their data pursuant to the Privacy Shield. Individuals wishing to exercise this right may do so by contacting us at privacy@duolingo.com

Duolingo will be responsible for the processing of personal data it receives, under the Privacy Shield Frameworks, and will subsequently transfer such data to a third party acting as an agent on its behalf. (Information on third parties is provided in section 6 of this Privacy Policy.) Duolingo complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Duolingo is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Duolingo may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements

In compliance with the EU-US and Swiss-US Privacy Shield Principles, Duolingo commits to resolve complaints about your privacy and our collection or use of your personal data. European Union or Swiss individuals with inquiries or complaints regarding this Privacy Statement should first contact Duolingo's Data Protection Officer at

Data Protection Officer, Duolingo, Inc., 23 Connaught House, 300 Hale Road, Hale Barns, Altrincham, Cheshire, WA15 8SP, United Kingdom
Phone: +1-412-567-6602
E-mail: privacy@duolingo.com

Duolingo has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of

your complaint, or if your complaint is not satisfactorily addressed, please
الخصوصية visit
<https://web.archive.org/web/20180705115213/https://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a
.complaint

Finally, as a last resort and under limited circumstances, EU and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.

CALIFORNIA PRIVACY RIGHTS .10

California Civil Code Section 1798.83 entitles residents of the State of California to request from a business, with whom that resident has an established business relationship, certain information regarding the types of personal data the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. If you would like to request a copy of this information disclosure from Duolingo, please contact us at privacy@duolingo.com.

CHILDREN UNDER AGE OF DIGITAL CONSENT .11

Duolingo provides some features and services intended for use by children. Duolingo uses age-gating to restrict what services are available to children depending on the age of the user and the applicable laws of their country. For example, a 15 year old child in Germany will require parental consent to use the Service, whereas a 12 year old child in the United States of America would receive a restricted service but not require parental consent.

Children within the European Union

Each European Union (EU) member state is permitted to legally define its own digital age of consent between 13 and 16. Duolingo checks the age and country of the user to determine if the user is able to consent to the Service. If consent of a parent/guardian is required, the user will input the e-mail address of an adult who will receive a request to approve the child's

account registration. In the absence of a country specific Act of Law, the ^{الخصوصية} age of consent will be set at 16

These EU child users will receive the following service restrictions: they will not be able to use the service until their parent/guardian has provided consent for the child to do so. After the parent/guardian has given consent, they child will be allowed to access the full Duolingo service

Where Duolingo does make features and services available to children, we recognize that collecting personal data from children requires further privacy protections. Accordingly, Duolingo will: (1) notify parents or guardians about Duolingo's privacy and information practices regarding children, including what personal data we collection and how we use, share, and protect that personal data; (2) limit our collection of personal data to ensure that we collect no more than is necessary to provide Duolingo's services; (3) obtain parental consent before collecting personal data from children; and (4) allow parents to request that Duolingo change or delete personal data about their children

Children outside of the European Union

If a child of under 13 years from outside the EU registers for the Duolingo service, upon registration the child will provide an adult's e-mail address, to whom Duolingo sends a notification

:These child users will receive the following service restrictions

- Instead of any Personally Identifiable Information about the child, we will only store ◦
 - .the e-mail address of their parent/guardian
- Only family friendly advertisements are shown and these ads do not do behavioral ◦
 - .tracking
- .Mature words such as "beer" and "wine" are disabled ◦
- .Social features are disabled, e.g. profiles, forums, clubs, etc ◦
- .They can not enter profile information such as a profile picture or a bio ◦

At all times Duolingo does not knowingly collect personal information from children in connection with the Service. If we discover that we have unknowingly collected personal information from these children, we will delete it. If you believe we have collected personal information from a child, please contact us at privacy@duolingo.com

LINKS .12

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The Service may contain links to other websites. We are not responsible for the privacy practices of other websites. We encourage users to be aware when they leave the Service to read the privacy statements of other websites that collect personally identifiable information. This Privacy Policy applies only to information collected by Duolingo via the Service

INFORMATION SECURITY .13

Duolingo has implemented administrative and technical safeguards it believes are appropriate to protect the confidentiality, integrity and availability of your personal data, Testing ID, User Photo, access credentials, and Duolingo English Test results. However, given sufficient resources, a determined attacker could defeat those safeguards and may, as a result, gain access to the data we seek to protect

DO NOT TRACK .14

The Service is not designed to respond to "do not track" signals sent by some browsers

CONTACT US .15

Duolingo's headquarters are located within the USA at:
Duolingo, Inc.
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Pittsburgh, PA 15206
United States of America
Phone: +1-412-567-6602

Within the EU, Duolingo, Inc. is a registered Data Controller with the UK Information Commissioner's Office (ICO), number ZA294891, at the address:
Duolingo, Inc.
23 Connaught House
300 Hale Road
Hale Barns
Altrincham

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Cheshire
WA15 8SP
United Kingdom

For all data privacy inquiries and any questions or concerns you have about this Privacy Policy, please contact our Data Protection Officer at privacy@duolingo.com

For all support inquiries, please go to [.https://web.archive.org/web/20180705115213/https://support.duolingo.com](https://web.archive.org/web/20180705115213/https://support.duolingo.com)

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